

raiser&kenniff

ATTORNEYS AT LAW

Steven M. Raiser
Thomas A. Kenniff
Douglas M. Reda

300 Old Country Rd, Suite 351
Mineola, NY 11501
Tel. 516-742-7600 • Fax 516-742-7618

Of Counsel
Edward Fregosi
John J. Rivas
Amy Sklar
Anthony J. Colletuori
Bruce R. Connolly
Marc S. Albert
Anthony V. Falcone
Jonathan Tand

December 1, 2021

VIA ECF

Hon. Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Gerard Sillam and Aldric Saulnier v. Labaton Sucharow, LLP, et al
No. 21 CV 6675 (CM)

Dear Judge McMahon:

Our office represents Gerard Sillam and Aldric Saulnier in the above referenced matter. We write to respectfully request an enlargement of time to respond to Defendants' Motion to Dismiss the Complaint.

The original deadline for our opposition is Friday, December 3, 2021. Our firm was retained on November 29, 2021 to represent Mr. Sillam and Mr. Saulnier. In order for us to properly investigate the facts and prepare our opposition, we are requesting a four-week extension to December 31, 2021, and a further two-week extension to January 14, 2022 for Defendants to file their reply.

No prior requests for extensions of time to oppose this motion have been requested and there is no scheduling order in place at the current time.

Opposing counsel have consented to this request provided that their reply time is also extended as requested herein.

Manhattan Office
87 Walker Street
New York, NY 10013
212-274-0090

www.raiserandkenniff.com

Suffolk Office
150 Motor Parkway, Suite 401
Hauppauge, NY 11788
888-504-2746

We thank the Court for its consideration of this matter and we stand ready to provide any additional information the Court may require.

Respectfully,

/s/

Douglas M. Reda

cc: Ira Matetsky (via ECF)
Mark Zauderer
Ganfer Shore Leeds & Zauderer, LLP
360 Lexington Avenue
New York, NY 10017
Attorney for Defendants